

**THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

**MICHAEL DAVID SILLS and MARY  
SILLS,**

**Plaintiffs,**

**v.**

**CASE NO: 3:23-CV-00478**

**SOUTHERN BAPTIST CONVENTION, a  
non-profit corporation; DR. ED LITTON,  
Individually, and as agent and/or employee of  
SOUTHERN BAPTIST CONVENTION;  
LIFEWAY CHRISTIAN RESOURCES OF  
THE SOUTHERN BAPTIST CONVENTION,  
a non-profit corporation; JENNIFER LYELL,  
Individually and as agent and/or employee of  
LIFEWAY CHRISTIAN RESOURCES OF  
SOUTHERN BAPTIST CONVENTION and  
SOUTHERN BAPTIST CONVENTION;  
ERIC GEIGER, Individually and as agent  
and/or employee of LIFEWAY CHRISTIAN  
RESOURCES OF THE SOUTHERN  
BAPTIST CONVENTION and SOUTHERN  
BAPTIST CONVENTION;  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION, a  
non-profit corporation; BART BARBER,  
Individually and as agent and/or employee of  
SOUTHERN BAPTIST CONVENTION;  
WILLIE MCLAURIN, Individually and as  
agent and/or employee of SOUTHERN  
BAPTIST CONVENTION and EXECUTIVE  
COMMITTEE OF THE SOUTHERN  
BAPTIST CONVENTION; ROLLAND SLADE,  
Individually and as agent and/or employee of  
SOUTHERN BAPTIST CONVENTION and  
EXECUTIVE COMMITTEE OF THE  
SOUTHERN BAPTIST CONVENTION;  
THE SOUTHERN BAPTIST THEOLOGICAL  
SEMINARY, a non-profit corporation;  
DR. R. ALBERT MOHLER, Individually and  
as agent and/or employee of THE SOUTHERN  
BAPTIST THEOLOGICAL SEMINARY and  
SOUTHERN BAPTIST CONVENTION;**

**SOLUTIONPOINT INTERNATIONAL, INC.,** |  
**a corporation, individually and d/b/a** |  
**GUIDEPOST SOLUTIONS; and** |  
**GUIDEPOST SOLUTIONS, LLC, a limited** |  
**liability corporation and agent of the Southern** |  
**Baptist Convention.** |  
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 |  
**Defendants.** |

**MOTION FOR PRO HAC VICE**

Thomas E. Travis files this motion requesting admission *pro hac vice* to serve as counsel for Defendants The Southern Baptist Theological Seminary and Dr. R. Albert Mohler, Individually and as an agent and/or employee of The Southern Baptist Theological Seminary, and in support thereof, states as follows:

1. Thomas E. Travis is currently a member in good standing of the state bar of the State of Kentucky. As demonstrated by the attached Certificate of Good Standing, Mr. Travis is currently admitted and in good standing to practice law in the state courts of Kentucky. See Exhibit 1.

2. Thomas E. Travis is admitted to practice before all courts in the State of Kentucky. There have been no disciplinary actions or investigations instituted against him. See Affidavit, attached hereto as Exhibit 2.

3. Mr. Travis seeks admission to appear *pro hac vice* in this case to represent Defendants The Southern Baptist Theological Seminary and Dr. R. Albert Mohler, Individually and as an agent and/or employee of The Southern Baptist Theological Seminary, in association with James C. Bradshaw III, who is admitted to practice before this Court and who is a member in good standing with the bar of the State of Tennessee.

4. Mr. Travis has read and will comply with all rules of the Court and agrees to be subject to the rules of the courts of Tennessee.

**WHEREFORE, PREMISES CONSIDERED,** Thomas E. Travis respectfully moves this Court to grant admission *pro hac vice*, as a non-resident attorney before the bar of this Court

for all proceedings on behalf of the Defendants The Southern Baptist Theological Seminary and Dr. R. Albert Mohler, Individually and as an agent and/or employee of The Southern Baptist Theological Seminary in connection with the above referenced civil action. A proposed Order permitting *pro hac vice* admission is also submitted herewith.

Respectfully submitted,

/s/ James C. Bradshaw III

James C. Bradshaw III, BPR #13170  
Ann Weber Langley, BPR #038070  
WYATT, TARRANT & COMBS, LLP  
333 Commerce Street, Suite 1050  
Nashville, Tennessee 37201  
(615) 251-6747  
[jbradshaw@wyattfirm.com](mailto:jbradshaw@wyattfirm.com)  
[alangley@wyattfirm.com](mailto:alangley@wyattfirm.com)

Byron Leet, (*Pending Pro Hac Vice*)  
Wyatt, Tarrant & Combs, LLP  
400 West Market Street  
Suite 2000  
Louisville, Kentucky 40202  
[bleet@wyattfirm.com](mailto:bleet@wyattfirm.com)

Thomas E. Travis, (*Pending Pro Hac Vice*)  
Wyatt, Tarrant & Combs, LLP  
250 West Main Street  
Suite 1600  
Lexington, Kentucky 40507  
[ttravis@wyattfirm.com](mailto:ttravis@wyattfirm.com)

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the following Notice of Appearance was emailed to counsel via the Court's Electronic Filing System (ECF) on this the 6<sup>th</sup> day of June, 2023:

<p>Gary E. Brewer, #942 BREWER AND TERRY, P.C. Attorneys at Law 1702 W. Andrew Johnson Hwy. P.O. Box 2046 Morristown, TN 37816 <a href="mailto:robin@brewerandterry.com">robin@brewerandterry.com</a></p> <p>John W. ("Don") Barrett Katherine Barrett Riley (TN BPR#: 021155) BARRETT LAW GROUP, P.A. 404 Court Square North P.O. Box 927 Lexington, MS 39095 <a href="mailto:dbarrett@barrettlawgroup.com">dbarrett@barrettlawgroup.com</a> <a href="mailto:kbriley@barrettlawgroup.com">kbriley@barrettlawgroup.com</a></p> <p>Shannon M. McNulty CLIFFORD LAW OFFICES, P.C. 120 N. LaSalle Street, 36th Floor Chicago, Illinois 60602 <a href="mailto:mm@cliffordlaw.com">mm@cliffordlaw.com</a></p> <p><i>Counsel for Plaintiffs</i></p>	<p>George H. Cate, III Kimberly M. Ingram- Hogan Bradley Arant Boulton Cummings LLP 1600 Division St., Suite 700 Nashville, TN 37203 <a href="mailto:gcate@bradley.com">gcate@bradley.com</a> <a href="mailto:kingram@bradley.com">kingram@bradley.com</a></p> <p><i>Counsel for Defendant LifeWay Christian Resources</i></p> <p>R. Bruce Barze, Jr. Barze Taylor Noles Lowther LLC 2204 Lakeshore Dr., Suite 425 Birmingham, AL 35209 <a href="mailto:bbarze@btnllaw.com">bbarze@btnllaw.com</a></p> <p><i>Counsel for Defendant Eric Geiger</i></p> <p>John R. Jacobson, Esq. Katherine R. Klein, Esq. Riley &amp; Jacobson, PLC 1906 West End Avenue Nashville, Tennessee 37203 <a href="mailto:jjacobson@rjfirm.com">jjacobson@rjfirm.com</a> <a href="mailto:kklein@rjfirm.com">kklein@rjfirm.com</a></p>
<p>Ronald G. Harris Philip N. Elbert Olivia R. Arboneaux Neal &amp; Harwell, PLC 1201 Demonbreun St., Suite 1000 Nashville, TN 37203 <a href="mailto:rharris@nealharwell.com">rharris@nealharwell.com</a> <a href="mailto:pelbert@nealharwell.com">pelbert@nealharwell.com</a> <a href="mailto:oarbhoneaux@nealharwell.com">oarbhoneaux@nealharwell.com</a></p> <p><i>Counsel for Defendant Jennifer Lyell</i></p>	<p>Steven G. Mintz, Esq. Terence W. McCormick, Esq. 600 Third Avenue, 25th Floor New York, NY 10016 <a href="mailto:mintz@mintzandgold.com">mintz@mintzandgold.com</a> <a href="mailto:mccormick@mintzandgold.com">mccormick@mintzandgold.com</a></p> <p><i>Counsel for Defendants Guidepost Solutions, LLC and SolutionPoint International, Inc</i></p>

*/s/ James C. Bradshaw III*